

In re: CC Docket No. 98-67, File No. TRS-22-02, Hawaii State Renewal Application, Telecommunications Relay Service

This is to oppose recertification for the following reasons:

- 1) There has been little or no outreach to those for whom the Speech-to-Speech(STS) Telephone Relay Service is designed, with the result that few people know about the service.
- 2) The STS service is in fact not provided by Verizon, Hawaii but is contracted out to Mainland operators who speak with a heavy Southern accent and don't understand Hawaii words, place names or common expressions.
- 3) The Hawaii Public Utilities Commission authorized an increase of the TRS surcharge from \$.07 to \$.17 per access line in Hawaii, effective January 31, 2002. The increased cost to Hawaii residential consumers alone would then be more than \$500,000 per year. Unfortunately, this money has not been spent on a service that works for users with speech disabilities or those who might want to use the service to communicate with them.

The surcharge is one of the highest in the country, yet quality and availability of the service is inadequate. Many states with lower surcharges do much better jobs of outreach. They also provide local operators to assist users. In other words, the surcharges assessed in other states may be serving the intended purpose, but in Hawaii it's hard to see why they are taking everyone's money.

- 4) The STS is so poor that a demonstration by its inventor, Bob Segalman, failed and became the subject of a front-page newspaper article in the Honolulu Star-Bulletin on August 15, 2002. After flying all the way to Hawaii he found that the service didn't work for him. If Dr. Segalman could not get the service to work, how can beginning Hawaii users expect to cope with it? The fact is they are not -- if the Hawaii PUC made utilization information available to the FCC, it would likely show that the service is hardly being used at all. Yet telephone subscribers are paying monthly to support it.

- 5) The cost to Verizon to publicize the service in their telephone books, which is required under the law, is negligible, but they did not do it. It would be a challenge to learn about STS service from a Hawaii phone book, or to learn how to get additional information. Surely, part of the \$500,000 or more collected could have gone to including information for people who might be looking for it.

Outreach must extend beyond telephone book entries, of course, because people who do not use the telephone also would not be reading the telephone book.

For these reasons, the FCC should not approve the Hawaii PUC application for recertification.

The people of Hawaii deserve better and I hope the FCC will take appropriate action in this matter.